

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

X CORP., a Nevada corporation,

Plaintiff,

v.

**MEDIA MATTERS FOR AMERICA, a
Washington, D.C. non-profit corporation,
ERIC HANANOKI, and ANGELO
CARUSONE,**

Defendants.

Civil Action No. 4:23-cv-01175-O

NOTICE OF DEFENDANTS' MOTION TO COMPEL DISCOVERY

Defendants Media Matters for America, Eric Hananoki, and Angelo Carusone file this Notice of Defendants' Motion to Compel Discovery.

Defendants are filing contemporaneously with this Notice a Motion to Seal Defendants' Brief and Appendix in Support of their Motion to Compel Discovery. For the reason stated in the accompanying Brief, Defendants request that the Court enter an order: (1) compelling X to produce documents responsive to Defendants' requests for production from text, Slack, Signal, Jira, and any other relevant messaging platforms, (2) overruling X's objections to Defendants' requests for production 64-68 regarding the frequency with which offensive ad pairings occurred on X; (3) compelling X to make its source code available for inspection, and (4) compelling X to present Elon Musk for deposition.

Respectfully submitted,

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America, Eric Hananoki, and Angelo
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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff has conferred with counsel for Defendant on March 5, 2025, and counsel for Plaintiff is opposed as to the disposition of the matters raised in this motion.

s/ Matthew C Behncke

Matthew C Behncke

CERTIFICATE OF SERVICE

I certify that on April 21, 2025, a true and correct copy of this pleading was properly served on counsel of record via electronic filing in accordance with the USDC, Northern District of Texas Procedures for Electronic Filing.

s/ Matthew C Behncke

Matthew C Behncke